

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

MARSHALL SMITH, BRANDON
HERMAN, CHAD PATTERSON, JEFFERY
ROBERTS, MICHAEL WILL, SUSAN
WINSTEAD, ROBERT BOHANNON,
HOLLY BUCKINGHAM, RICHARD
MORELLO, JR., ROBERT HARRIS,
AMANDA LARISCY, CHARLES
NEWMAN, and PAUL CHRISTIANSEN
individually and on behalf of all similarly
situated persons,

Plaintiffs,

v.

COMPLYRIGHT, INC., a Minnesota
corporation,

Defendant.

Civil Action No. 1:18-cv-4990

CLASS ACTION

Jury Trial Demanded

Hon. Edmond E. Chang

AMENDMENT TO THE SETTLEMENT AGREEMENT

This Amendment to the Settlement Agreement (“Amendment”), dated May 23, 2019, amends the Settlement Agreement filed on May 22, 2019 (the “Settlement”) as follows:

1. The following language is stricken from paragraph 5.1(vi) of the Settlement: “or the objector’s counsel (on behalf of any person or entity).” As amended, paragraph 5.1(vi) shall read as follows: “all other cases in which the objector (directly or through counsel) has filed an objection to any proposed class action settlement, has been a named plaintiff in any class action, or has served as lead plaintiff class counsel, including the case name, court, and docket number for each.”

2. Paragraph 5.1(viii) of the Settlement is amended to read as follows: “documents sufficient to demonstrate any court-imposed sanctions entered against objector’s counsel arising out of objections to any class or collective action settlement approval.”

3. Paragraph 7.2 of the Settlement is amended to replace “\$30,000” with “\$32,500.”

IN WITNESS THEREOF, the Settling Parties have caused this Amendment to the Settlement to be executed, by their duly authorized attorneys.

Dated: May 23, 2019

By: s/ Hsiao C. (Mark) Mao

Hsiao C. (Mark) Mao (*pro hac vice*)
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By: s/ Ben Barnow

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Proposed Co-Lead Settlement Class Counsel

ECF CERTIFICATION

The filing attorney attests that he obtained consent regarding the filing of this document from the signatories to the document.

By: s/ Ben Barnow

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2019, the foregoing document was filed with the Court's CM/ECF system, which will provide notice of electronic filing to all counsel of record.

By: s/ Ben Barnow

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